

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

ePLUS INC., )  
                  )  
                  )  
Plaintiff,     )  
                  )  
                  )  
v.               ) Civil Action No. 3:09cv620 (REP)  
                  )  
LAWSON SOFTWARE, INC., )  
                  )  
                  )  
Defendant.     )

**DEFENDANT LAWSON SOFTWARE, INC.'S MOTION IN LIMINE NO. 2  
TO EXCLUDE EVIDENCE OF SALES OF NONINFRINGEMENT  
PRODUCTS AND SERVICES**

Defendant Lawson Software, Inc. (“Lawson”), by counsel, moves *in limine* to preclude Plaintiff ePlus Inc. (“ePlus”) from presenting evidence and argument relating to damages based on license or other revenue relating to product SKUs that are not accused of infringing the patents-in-suit. Specifically, Lawson moves to exclude evidence relating to the following SKUs: PPS, PHS, and FINPRO (the “Large Suite SKUs”); LSF or LSFN (the “Foundation SKUs”); LTMPFI, PFI, PFIEC, PFIP, PFP, PFST, and PFX (the “Process Flow SKUs”); and M3EBA, M3EDI, M3EPP, M3ESF, M3PFX, M3PUR, M3WDT, PUR, and EBA (the “Additional M3 SKUs”); and ZLTCB and ZLTCS (the “Total Care SKUs”). The grounds for this motion are more fully set forth in Lawson’s Memorandum in Support of this Motion, which is filed herewith.

LAWSON SOFTWARE, INC.

By \_\_\_\_\_  
                          /s/  
                          Of Counsel

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**CERTIFICATE OF SERVICE**

I certify that on this 18<sup>th</sup> day of June, 2010, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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